

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ARLENE J. DELGADO,
Plaintiff,

-vs-

No. 19-cv-11764 (AT) (KHP)

DONALD J. TRUMP FOR PRESIDENT, INC.,
TRUMP FOR AMERICA, INC., SEAN SPICER,
individually, REINCE PRIEBUS, individually,
and STEPHEN BANNON, individually,

Defendants.

DECLARATION OF ARLENE J. DELGADO

Arlene J. Delgado hereby swears as follows:

I am the Plaintiff in this litigation. In 2017, the Defendant-Campaign, at the time represented in this matter by Marc Kasowitz of Kasowitz Benson Torres, expressed that any settlement reached (on which the Campaign later reneged) should remain confidential. It was expressed that “Trump” is known for “not settling” and that Trump and the Campaign would need to keep this confidential. My attorneys expressed this would not be possible because disbursements by a Campaign are public record. Mr. Kasowitz dismissed the concerns easily, stating words to the effect of, “That is not a problem at all. What we would do is the Campaign pays me and then I cut a check to you guys.” In other words, the payment would be routed through a middleman, to hide the fact that the Campaign had settled, from the public and the FEC. I thus have direct, personal experience with the Defendant-Campaign hiding settlement payments to women, routing them through a ‘middleman law firm,’ which to the public would only appear as payments “for legal services.”

I have information and reason to believe that payments made to (a) Kasowitz Benson Torres LLP (\$4.1 million from the Campaign to the firm, in a mere two month period immediately following the November 2020 election), and payments made to (b) Red Curve Solutions (which is not a legal entity or law firm, for “legal reimbursements” totaling millions of dollars in a short period of time), reflect legal services related to, and monetary settlements paid to, women who raised complaints of gender discrimination, pregnancy discrimination, and sexual harassment -- complaints which are currently withheld from the Defendant-Campaign, despite the Court’s April 24, 2024 Order requiring disclosure/production of such to Plaintiff.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, this the 8th day of May, 2024.

s/Arlene Delgado
Arlene Delgado